

MICHAEL A. JACOBS (CA SBN 111664)
MJacobs@mofo.com
ARTURO J. GONZÁLEZ (CA SBN 121490)
AGonzález@mofo.com
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, California 94105-2482
Tel: 415.268.7000 / Fax: 415.268.7522

KAREN L. DUNN (*Pro Hac Vice*)
kdunn@bsfllp.com
HAMISH P.M. HUME (*Pro Hac Vice*)
hhume@bsfllp.com
BOIES SCHILLER FLEXNER LLP
1401 New York Avenue, N.W.
Washington DC 20005
Tel: 202.237.2727 / Fax: 202.237.6131

WILLIAM CARMODY (*Pro Hac Vice*)
bcarmody@susmangodfrey.com
SHAWN RABIN (*Pro Hac Vice*)
srabin@susmangodfrey.com
SUSMAN GODFREY
1301 Avenue of the Americas, 32nd Floor
New York, NY 10019-6023
Tel: 212.336.8330 / Fax: 212.336.8340

Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF
MICHELLE YANG IN SUPPORT OF
PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL WAYMO'S
RESPONSE TO ORDER REGARDING
LETTER FROM UNITED STATES
ATTORNEY (DKT. 2281)**

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this
3 declaration based upon matters within my own personal knowledge and if called as a witness,
4 I could and would competently testify to the matters set forth herein. I make this declaration in
5 support of Plaintiff Waymo LLC's Administrative Motion to File Under Seal Waymo's Response
6 to Order Regarding Letter from United States Attorney (Dkt. 2281).

7 2. I have reviewed the following documents and confirmed that only the portions
8 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Exhibit 1 to Waymo's Response	See ¶ 3, below
Exhibit 6 to Waymo's Response	Entire Document

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13 3. I understand that Exhibit 1 to Waymo's Response is the same document as
14 Exhibit B to the Court's November 29, 2017 Order (Dkt. 2307-2), for which the Court has already
15 granted sealing with respect to the green-highlighted portions of that document. (Dkt. 2307 at 2.)
16 Exhibit 1 to Waymo's Response contains information that implicates the safety, privacy, and
17 reputational interests of former and current Uber employees and vendors, as well as various third-
18 party individuals and entities. Defendants support sealing of the green-highlighted portions in
19 Dkt. 2307-2, and may also attempt to obtain additional redactions from the appeals court before
20 the Court's deadline of December 13 at noon. (Dkt. 2307 at 2.)

21 4. Exhibit 6 contains highly confidential information regarding a list of Uber's
22 internal servers, disclosure of which could compromise the security and privacy of Uber's
23 internal systems. Exhibit 6 also contains a list of company employees and their corresponding
24 locations, as well as third-party vendors, suppliers, and consultants, some of whom are under non-
25 disclosure agreements with Uber. Defendants request this information be sealed to protect the
26 safety and privacy interests of individuals who may face harm or harassment, and to protect
27 confidential business relationships from disclosure and possible interference from competitors.
28

5. Defendants' request to seal is narrowly tailored to the portions of Waymo's Response and supporting exhibits that merit sealing.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 1st day of December, 2017 at San Francisco, California.

/s/ Michelle Yang

Michelle Yang